

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<b>In re:</b>  <b>FIELDWOOD ENERGY LLC, <i>et al.</i>,</b>  <b>Debtors.<sup>1</sup></b>	<b>§ Chapter 11</b> <b>§</b> <b>§ Case No. 20-33948 (MI)</b> <b>§</b> <b>§ (Jointly Administered)</b>
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**BP EXPLORATION & PRODUCTION INC. AND AFFILIATES’  
NOTICE OF ELECTION TO OPT OUT  
OF RELEASES IN DEBTORS’ JOINT CHAPTER 11 PLAN**  
[Relates to Docket Nos. 1284; 1286]

**PLEASE TAKE NOTICE** that BP Exploration & Production Inc. (together with each of its affiliates, collectively, “BP”) hereby submits this notice (the “Opt Out Notice”) of opt out of the releases set forth in Section 10.7(b) of the *Fourth Amended Joint Chapter 11 Plan of Fieldwood Energy LLC and its Affiliated Debtors* [Docket No. 1284] (as may be amended, revised, or supplemented, the “Plan”) filed by the above-captioned debtors (collectively, the “Debtors”).

**PLEASE TAKE FURTHER NOTICE** that BP did not receive a Release Opt Out Form (as such term is defined in Exhibit 8 to the Court’s Amended Order approving, *inter alia*, the Debtors’ Disclosure Statement [Dkt. No. 1286]), nor did BP receive a ballot to vote on the Plan. Accordingly, and although BP is not within the definition of “Releasing Parties” under the Plan, out of an abundance of caution and for the avoidance of any doubt, BP does not consent to, affirmatively opts out of, and elects not to grant the third-party releases and related injunctions contained in the Plan.

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, as applicable, are: Fieldwood Energy LLC (6778), Fieldwood Energy Inc. (4991), Fieldwood Onshore LLC (3489), Fieldwood SD Offshore LLC (8786), Fieldwood Energy Offshore LLC (4494), Fieldwood Offshore LLC (2930), GOM Shelf LLC (8107), FW GOM Pipeline, Inc. (8440), Galveston Bay Procession LLC (5703), Galveston Bay Procession LLC (0422), Fieldwood Energy SP LLC (1971), Dynamic Offshore Resources NS, LLC (0158), Bandon Oil and Gas, LP (9266), and Bandon Oil and Gas GP, LLC (9172). The Debtors’ primary mailing address is 2000 W. Sam Houston Parkway S., Suite 1200, Houston, TX 77042.

**PLEASE TAKE FURTHER NOTICE** that substantially contemporaneously with the filing of this Opt Out Notice, BP has also submitted an executed Release Opt Out Form to the Debtors' Voting Agent, Prime Clerk LLC.

**WHEREFORE**, by this Opt Out Notice, BP does not consent to and affirmatively elects to opt out of the Plan's third-party release provisions, as they are currently drafted or as they may be amended from time to time, and otherwise reserves all rights and remedies at law or in equity without waiving anything.

Date: June 2, 2021

Respectfully submitted,

**GREENBERG TRAURIG, LLP**

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***Counsel for BP Exploration & Production Inc. and affiliates***

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on June 2, 2021, I caused a copy of the foregoing to be served on all parties eligible to receive service through the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas by electronic mail.

By: /s/ Karl D. Burrer

Karl D. Burrer